

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	
	:	Criminal No. 1:CR-01-195-06
	:	
v.	:	(Judge Caldwell)
	:	
	:	
HARVEY HOLLAND	:	(Electronically Filed)

**DEFENDANT'S MOTION FOR
EXTENSION OF TIME TO FILE BRIEF**

AND NOW, comes the Defendant, Harvey Holland, by and through his court-appointed attorney, Gregory Barton Abeln, Esquire, who respectfully requests an extension of time to file his brief in support of his §2255 Motion and avers as follows:

1. On June 22, 2005, a hearing was held before this Honorable Court on the issues raised in the Defendant's §2255 Motion.
2. By Order of Court on July 27, 2005, this Honorable Court set a deadline for the brief in support of the Defendant's §2255 Motion for August 12, 2005
3. The undersigned counsel has a previously scheduled out-of-state vacation planned from July 29th to August 7th.
4. A brief ten-day extension would be sufficient to properly prepare the Defendant's brief in support of his §2255 Motion.
5. Counsel for the government concurs with this request.

WHEREFORE, it is respectfully requested that a ten-day extension on the briefing schedule be granted to allow counsel for the Defendant sufficient time to prepare the brief in support of the §2255 Motion.

Respectfully submitted,
ABELN LAW OFFICES

August 5, 2005

Date

/s/ Gregory Barton Abeln

Gregory Barton Abeln, Esquire

Atty. ID# 35960

37 E. Pomfret Street

Carlisle, PA 17013

717/245-2851

E-Mail: abelnlaw@earthlink.net

CERTIFICATE OF CONCURRENCE

I, Gregory Barton Abeln, Esquire, hereby certify that on August 2, 2005, I contacted AUSA William Behe who stated that he would concur in the foregoing motion.

August 5, 2005
Date

/s/ Gregory Barton Abeln
Gregory Barton Abeln, Esquire

CERTIFICATE OF SERVICE

I, Darlene F. Mellinger, do hereby certify that on this date I served a copy of the
MOTION FOR EXTENSION OF TIME TO FILE BRIEF, via Electronic Case Filing, or by
placing a copy in the United States mail, first class, addressed to the following:

AUSA William Behe, Esquire
Assistant U.S. Attorney
228 Walnut Street
Harrisburg, PA 17108

AND

Harvey Holland
EP8162
SCI – Camp Hill
PO Box 1000
Camp Hill, PA 17111-1000

Respectfully submitted,
ABELN LAW OFFICES

August 5, 2005
Date

/s/ Darlene F. Mellinger
Darlene F. Mellinger,
Legal Assistant
37 E. Pomfret Street
Carlisle, PA 17013
717/245-2851
E-Mail: abelnlaw@earthlink.net